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2008 DEC 15 A 9 47

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December 12, 2008

By Fax: 202-219-3923 and Regular Mail

Jeff S. Jordan
Supervisory Attorney Complaints Examination
And Legal Administration
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

Re: MUR# 6092

In re Religious Society of Friends: Quaker

Dear Mr. Jordan:

On behalf of Purchase Meeting, Religious Society of Friends ("Respondent Quakers"), incorrectly complained of herein by David Hood, Jr. as "Religious Society of Friends: Quaker," this letter is submitted in response to the complaint filed by David Hood, Jr. ("the Complaint") and subsequently labeled MUR no. 6092. A designation of counsel was previously mailed to you on October 31, 2008.

The facts and circumstances surrounding the rental of the meeting house are briefly set forth in the accompanying affirmations of (1) the undersigned as President of the Quakers and (2) Joyce Schroeder, the renter of the meeting house.

Respondent Quakers respectfully request that the Complaint be dismissed as it fails to allege a violation of federal election law and asserts no facts that give rise to a reason to believe that federal election law has been violated.

The Commission may find "reason to believe" only if a complaint sets forth sufficient specific facts, which, if proven true, would describe a violation of a statute or regulation over which the Commission has jurisdiction. 11 C.F.R. 111.4(a), (d) (2008).

The Complaint herein merely describes a meeting of Respondent Quakers wherein the Quakers rented their meeting house out for a fundraising event. The complaint utterly fails to allege any facts supporting a violation of any federal election law.

The Complaint does not allege any contribution from Respondent Quakers to any campaign or political committee. The Complaint confirms merely that "it was agreed by the meeting for business that they would rent the building..." but fails to state how the rental was a violation of a federal campaign law.

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In fact, there is not even a mention of federal election law in the Complaint. No reference is made to any section of the federal election statutes.

The complaint only briefly states that tax-exempt organizations may not engage in partisan politics. Yet there is no allegation of any action by the Respondent Quakers that would constitute partisan politics. Further, even if the complaint did contain an allegation of illegal activity that may have violated the prohibition against partisan political activities by tax-exempt religious entities under the Internal Revenue Code, the Commission has no jurisdiction to hear such a claim.

In the absence of any facts or allegations supporting the existence of a violation of federal election laws or of provisions of the Internal Revenue Code, the complaint tries to create the appearance of impropriety by *questioning* whether there may have been violations of law.

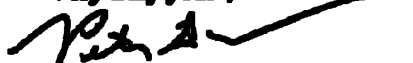
In effect, Complainant seeks to have this Commission go on a fishing expedition by creating the appearance of facts by asking prejudicial questions without any factual foundation. This backdoor attempt to bootstrap the Complaint on the back of questions instead of allegations of fact should not be countenanced by this Commission.

If this is the threshold that a complainant has to meet to bring a complaint before this Commission, then this Commission may soon be flooded with similar baseless complaints. Mere speculation should not be accepted as true and should not provide an independent basis for investigation. See Commissioner Mason, Sandstrom, Smith and Thomas, Statement of Reasons, MUR 4960 (Dec. 21, 2001).

It is respectfully submitted that the Complaint does not allege any facts that describe a violation of federal election law.

Therefore, pursuant to 11 C.F.R. 111.4(d), it is respectfully requested that this Commission dismiss the Complaint in its entirety and that Respondent Quakers have such other and further relief as this Commission deems appropriate in the circumstances including an award for the costs and disbursements of this proceeding.

Very truly yours,



Peter D. Close
Designated Counsel for
Respondent Purchase Meeting
Religious Society of Friends

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